

# Exhibit B

The specific requests at issue, and the CBSD responses thereto are:

6. Bridgett Szychulski personnel file, including but not limited to his resume(s), employment application, hiring records, termination records, administrator observations, evaluation reports, documents of reprimand, and disciplinary records, whether maintained in an employment or separate file, that were kept by school administrators including those housed in the Superintendent's or other administrative office.

RESPONSE: Objection. This request is overly broad, seeks the production of confidential personnel records relating to a non-party prior employee and seeks information which is not calculated to lead to the discovery of relevant evidence.

8. All documents reflecting complaints (formal or informal), allegations of misconduct made against, or concerns raised about, Bridgett Szychulski.

RESPONSE: Objection. This request is overly broad, seeks the production of confidential personnel records relating to a non-party prior employee, seeks the production of records relating to non-party minors which cannot be produced absent a Court Order. Further, the request seeks information which is not calculated to lead to the discovery of relevant evidence.

10. All documents concerning the reporting of Joseph Ohrt and Bridgett Szychulski to the Pennsylvania Department of Education, the police, and/or any institution responsible for teacher discipline, misconduct, licensing, and/or certification.

RESPONSE: Objection. This request is overly broad, unduly burdensome, vague, ambiguous, and seeks the production of documents that are not calculated to lead to the discovery of relevant evidence. Notwithstanding this objection, See attached documents relating to Ohrt.

14. All communications, documents, and/or records concerning Joseph Ohrt and Bridgett Szychulski provided to the police or the Bucks County District Attorney's office.

RESPONSE: Objection. This request is overly broad, unduly burdensome, vague, ambiguous, unlimited to date. Notwithstanding this objection, see Ohrt's personnel records attached hereto. (emphasis in responses omitted)